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Before the
Federal Communications Commission
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Numbering Resource Optimization

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DOCKET FILE COPY ORIGINAL

CC Docket No. 99-200

RM No. 9258

NSD File No. L-99-17

NSD File No. L-99-36

NSD File No. L-99-51

PETITION FOR RECONSIDERATION

Pursuant to Section 1.106 of the Commission's Rules, 47 C. F. R. § 1.106, Telcordia Technologies, Inc., hereby submits this petition for reconsideration, requesting the Commission to treat the Comments (attached) which Telcordia filed on May 19, 2000 in this docket, as supplemented herein, as a substantive Petition for Reconsideration.

Telcordia reiterates its support for the Commission's decision to utilize competitive bidding to select a Pooling Administrator (PA). Telcordia believes, however, that the contract for Pooling Administrator need not and should not be tied to the contract for the North American Numbering Plan Administrator. To do so would mean that the contract would likely have a term of less than 14 months. Given the Common Carrier Bureau's letter ruling on June 7, 2000, in which it clarified its interpretation of Section 52.13(g) of the Commission's rules, 47 C.F. R. § 52.13(g), governing the transfer of intellectual property (IP) and given that the newly-selected PA must also adhere to that rule, Telcordia believes that a longer PA contract term will enable the administrator to better amortize IP and other contract costs over a longer period of time thus facilitating the industry's ability to absorb those costs. The alternative, that the PA administrator must risk not recovering its costs, is commercially unreasonable.

Furthermore, given that the RFP has not yet been considered by the full NANC and the Commission, and has not been subject to the comments contemplated in the Commission's order,

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the 14 month period we are currently projecting may in fact be much shorter, which would exacerbate the difficulties associated with an excessively short period.

The Commission wisely solicited bids for the NANPA contract assuming a five year term, and apparently intends to do so when that contract ends. This approach was appropriate, and in the view of Telcordia should be applied alike to the pooling administrator RFP. Telcordia accordingly strongly urges the Commission to solicit bids for a full five year term.

Respectfully submitted,

Telcordia Technologies, Inc.

By its attorneys:



Michael S. Slomin



Louise L. M. Tucker

Michael S. Slomin, Senior Counsel
Telcordia Technologies
445 South Street, MCC-1J130R
Morristown, NJ 07960
(973) 829-2355

Louise L. M. Tucker, Senior Counsel
Telcordia Technologies, Inc.
2020 K Street, N.W., Suite 400
Washington, D.C. 20006
(202) 776-5440

July 13, 2000

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

In the Matter of)	
)	CC Docket No. 99-200
Numbering Resource Optimization)	
)	

COMMENTS OF TELCORDIA TECHNOLOGIES, INC.

Telcordia Technologies, Inc. ("Telcordia") strongly endorses the decision of the Commission in this proceeding to utilize competitive bidding to select a Pooling Administrator.¹ However, there is a risk that such competitive bidding may be undermined in practice, and Telcordia hereby provides recommendations to minimize this risk.

In its decision, the Commission has wisely concluded that an open and fair competitive bidding framework that includes an opportunity for participation by all interested parties will ensure the selection of the most qualified, cost-efficient Pooling Administrator.² The Commission also acknowledges that many number administration functions are currently performed by a single entity, NeuStar, and it wisely recognizes the advantages of vendor diversity for number administration services to the industry and the public.³ Telcordia agrees fully with these conclusions, and believes that they will promote the public interest and the objectives of the Communications Act.

The purpose of this filing is to emphasize, however, that because of the unique circumstances that led to the Commission's decision to utilize competitive bidding for the

¹ *Numbering Resource Optimization*, ("NRO order") FCC 00-104, released Mar. 31, 2000 at paras. 148-155.

² *Id.*, para. 148.

³ *Id.*, para. 152.

Pooling Administrator, there is a likelihood that this decision may be undermined over time unless the Commission and its staff vigilantly continue to promote competition.

The most significant threat to competition is that one potential bidder, NeuStar, has effectively had sole access to the North American Numbering Council (NANC) and its Issues Management Group (IMG) for over eighteen months.⁴ This has undoubtedly provided NeuStar unfair advantages in the competitive bidding process. It alone knows the thinking of the NANC IMG on the detailed technical and operational issues involved (*i.e.*, the issues that are to be addressed in a bid), and it alone has had an opportunity to shape that thinking to accommodate the NeuStar systems and capabilities it would propose to use for pooling administration. Furthermore, the same IMG has been tasked by the NANC to revise its confidential technical requirements document in response to the NRO Order.⁵

If the significant benefits of meaningful competitive bidding are to be achieved, these NeuStar advantages must be minimized. At minimum, the Commission needs to ensure that the resulting Request for Proposals (RFP) provides all potential bidders all of the technical and operational criteria that they will need to meet; that it does so generically and not tailored to NeuStar's systems and capabilities; and that any claims for proprietary treatment of information by NeuStar not interfere with provision in the RFP of all information that is relevant to a bid.

To the extent that the Pooling Administrator will need to interface with systems and capabilities administered by NeuStar in its NANPA and NPAC administrator capacities, the Commission also needs to ensure that NeuStar provides complete information on interfacing

⁴ A number of meetings were held that excluded participants and observers that had not signed NeuStar non-disclosure agreements, *i.e.*, agreements to maintain confidential and not use information provided by NeuStar. A competitor of NeuStar obviously could not sign such an agreement without risking future charges that it had misappropriated NeuStar's information, and Telcordia accordingly did not sign such an agreement, and therefore was unable to participate in such meetings.

⁵ NRO Order, para. 152.

with those systems and capabilities, and that NeuStar will in fact provide such interfaces and diligently work cooperatively with the entity that is selected as Pooling Administrator.⁶

Similarly, the Commission needs to remain vigilant to ensure that NeuStar does not use its NANPA and NPAC administrator status to make any *ex parte* presentations on the merits or related to bidding for pooling administration, except as specifically authorized by the Commission, and then only in a manner that does not provide NeuStar advantages over other bidders. In this regard, all potential bidders should be invited to any conferences held with potential bidders by Commission staff, by the NANC or by the NANC IMG prior to submission of bids in response to the RFP, and all bidders should be accorded comparable opportunities for individual discussions with Commission staff, with the NANC and with the NANC IMG after submission of their bids, should any such discussions be conducted.

Finally, Telcordia observes that the award cycle adopted in the NRO Order is so short⁷ as to make it difficult for a Pooling Administrator bidder to recoup its start up costs. Start up costs are normally recovered over the term of a contract so as not to create a pricing bulge at the outset. However, the contemplated period, approximately 14 to 18 months (depending upon the respective RFP and bidding cycles), could have the effect of causing a bidder either to quote unnecessarily high per-year prices if it seeks to recover all start up costs in this short time period, or potentially to lose money if it sets the prices below that level and its contract is not subsequently renewed.

⁶ NeuStar will have obvious incentives not to cooperate, so as to “demonstrate” that the NANPA and Pooling Administrator functions should be combined in the future. For the benefits of competition to be realized here, it must be made clear that this type of “gamesmanship” will not be tolerated.

⁷ NRO Order at para. 155 (“the Commission will solicit bids for a national Pooling Administrator to serve until the completion of the current NANPA administrator term.”)

Telcordia notes that, in contrast, the Commission set the NANPA contract for bidding on a 5 year term, which enabled the NANPA to recover its start up costs in a reasonable fashion that did not result in unnecessarily high prices. Telcordia urges the Commission to set the Pooling Administrator award period to a comparable 5 year term. Such a longer term would also raise the value of the contract, which may attract more bidders.

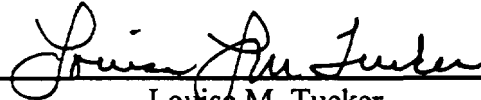
Respectfully submitted,

TELCORDIA TECHNOLOGIES, INC.

By its attorneys:



Michael S. Slomin



Louise M. Tucker

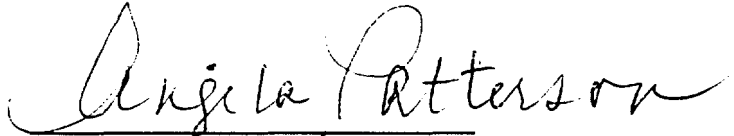
Michael S. Slomin, Senior Counsel
Telcordia Technologies, Inc.
445 South Street, MCC-1J130R
Morristown, New Jersey 07960
(973) 829-2355

Louise M. Tucker, Senior Counsel
Telcordia Technologies, Inc.
2020 K Street, NW, Suite 400
Washington, D. C. 20006
(202) 776-5440

May 19, 2000

CERTIFICATE OF SERVICE

I, Angela Patterson, hereby certify that on this 19th day of May, 2000, copies of the foregoing Comments of Telcordia Technologies, Inc. in CC Docket 99-200, were served, via first-class, U.S. mail or hand delivered to the individuals listed on Attachment A.

A handwritten signature in cursive script that reads "Angela Patterson". The signature is written in black ink and is positioned above a horizontal line.

Angela Patterson

ATTACHMENT A

James R. Hobson
National Emergency Number Association
Donelan, Cleary, Wood & Maser, P.C.
1100 New York Avenue, N.W., #750
Washington, DC 20005-3934

W. Mark Adams, Esq.
Executive Director, NENA
491 Cheshire Road
Sunbury, OH 43074

Larry A. Peck
Counsel for Ameritech
Room 4H86
2000 West Ameritech Center Drive
Hoffman Estates, IL 60196-1025

Dr. H. Gilbert Miller
Vice President
Mitretek Systems, Inc.
Ctr. For Telecom. And Adv. Technology
7525 Colshire Drive
McLean, VA 22102

Ronald R. Conners
Director
No. American Numbering Plan Admin.
1133 15th Street, NW., 12th Floor
Washington, DC 20005

Larry A. Blosser, Esq.
Kemal Hawa, Esq.
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, DC 20007
Counsel for Connect Comm. Corp.

John J. Farmer, Jr.
Attorney General of New Jersey
Eugene Provost, Deputy Attorney General
Division of Law
Attorney for the NJ Board of Public Utilities
124 Halsey Street – 5th Floor
P.O. Box 45029
Newark, NJ 07101

Counsel for RCN Telecom Services, Inc.
Russell M. Blau
Michael R. Romano
Jeanne W. Stockman
Kathlenn L. Greenan
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, DC 20007

Counsel for Choice One Communications
Inc. and GST Telecommunications, Inc.
Dana Frix
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, DC 20007

Liberty Telecom LCC
Edward A. Yorkgitis, Jr.
Kelley, Drye & Warren, LLP
1200 19th Street, Suite 500
Washington, DC 20036

Mr. Alvin McCloud
FCC/Common Carrier Bureau
Network Services Division
445 12th Street, SW – Room 6-A423
Washington, DC 20554

International Transcription Services, Inc.
1231 20th Street, NW
Washington, DC 20037

International Transcription Services, Inc.
The Portals
445 12th Street, SW – Room C
The Portals
445 12th Street, SW – Room C-B400
Washington, DC 20554

Attorneys for Omnipoint Communications
Benjamin H. Dickens, Jr.
Michael B. Adams, Jr.
Blooston, Mordkofsky, Jacson & Dickens
2120 L Street, NW
Washington, DC 20037

John McHugh
Stuart Polikoff
Kathleen Kaercher
OPASTCO
21 Dupont Circle, N.W., Suite 700
Washington, DC 20036

ATTACHMENT A

Delia Reid Saba
Christopher J. Wilson
Attorneys for Cincinnati Bell Tele. Co.
201 E. 4th Street
Cincinnati, OH 45202

Dave A. Miller
Vice President, Legal and Regulatory Affairs
VoiceStream Wireless Corporation
3650 131st Avenue, SE, Suite 400
Bellevue, WA 98006

Jonathan E. Canis
Eurico C. Soriano
Kelley, Drye & Warren, LLP
1200 19th Street, NW, 5th Floor
Washington, DC 20036

North Carolina Utilities Commission
Robert H. Bennick, Jr.
General Counsel
Erin K. Duffy
Commission Staff
430 N. Salisbury Street
Raleigh, NC 27603

Richard L. Jones
INENA Vice President
c/o Loves Park 9-1-1
540 Loves Park Drive
Loves Park, IL 61111

Douglas F. Carlson
PO Box 12574
Berkeley, CA 94712-3574

Bob Pinzler
Chair, SBCCOG
Councilman, Redondo Beach
5033 Rockvalley Road
Rancho Palos Verdes, CA 90275

Raymond L. Gifford, Chairman
Vincent Majkowski, Commissioner
Robert J. Hix, Commissioner
Colorado Public Utilities Commission
Logan Tower, Office Level 2
1580 Logan Street
Denver, CO 80203

Michael Travieso
Chair, Telecommunications Committee
NASUCA
1133 15th Street, N.W., Suite 550
Washington, DC 20005

Lee L. Selwyn
Susan M. Baldwin
Helen Golding
Economics and Technology, Inc.
One Washington Mall
Boston, MA 02108

Counsel for The Ad Hoc Telecom. Users
Committee
James S. Blaszk
Levine, Blaszk, Block and Boothby, LLP
2001 L Street, NW, Suite 900
Washington, DC 20036
Attorney for Centennial Cellular Corp.

Karlyn D. Stanley
Cole Raywid & Braverman, LLP
1919 Pennsylvania Avenue, NW, Suite 200
Washington, DC 20006

Attorney for Thumb Cellular Ltd. Partnership
Mark J. Burzych
Foster Swift Collins & Smith, PC
313 South Washington Square
Lansing, MI 48933-2193

Susan W. Smith
Director – External Affairs
CenturyTel Wireless, Inc.
3505 Summerhill Road
No. 4 Summer Place
Texarkana, TX 75501

Attorney for Trillium Cellular Corp.
Kenneth E. Hardman
Moir & Hardman
1828 L Street, NW, Suite 901
Washington, DC 20036-5104

Marsha N. Cohen
2201 Lyon Street
San Francisco, CA 94115

ATTACHMENT A

Michael A. Sullivan
15 Spencer Avenue
Somerville, MA 02144

NEXTLINK Communications, Inc.
R. Gerard Salemme
Daniel Gonzalez
Jason Williams
1730 Rhode Island Avenue, NW
Suite 1000
Washington, DC 20036

DAVIS WRIGHT TREMANE LLP
Daniel M. Waggoner
Robert Tanner
Jane Whang
1155 Connecticut Ave., Suite 700
Washington, DC 20036

James Bradford Ramsay
NARUC Assistant General Counsel
1100 Pennsylvania Avenue, NW
Suite 603
Washington, DC 20004

Attorney for Cox Communications, Inc.
Werner K. Hartenberger
J.G. Harrington
Dow, Lohnes & Albertson, PLLC
1200 New Hampshire Avenue, N.W
Suite 800
Washington, DC 20036

Chairman William Kennard
Federal Communications Commission
445 12th Street, SW – Room 8-B201
Washington, DC 20554

Commissioner Susan Ness
Federal Communications Commission
445 12th Street, SW – Room 8-B115
Washington, DC 20554

Commissioner Michael Powell
Federal Communications Commission
445 12th Street, SW – Room 8-A204
Washington, DC 20554

Commissioner Harold Furchtgott-Roth
Federal Communications Commission
445 12th Street, SW – Room 8-A302
Washington, DC 20554

Commissioner Gloria Tristani
Federal Communications Commission
445 12th Street, SW – Room 8-C302
Washington, DC 20554

Jared Carlson
Federal Communications Commission
445 12th Street, SW – Room 6A331
Washington, DC 20554

Jeannie Grimes
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Tejal Mehta
Federal Communications Commission
445 12th Street, SW – Room 6A431
Washington, DC 20554

Joel Taubenblatt
Federal Communications Commission
445 12th Street, SW – Room 4A260
Washington, DC 20554

Yog Varma, Deputy Chief
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW – 5th Floor (5C352)
Washington, DC 20554

Anna Gomez
Chief, Network Services Division
Federal Communications Commission
445 12th Street, SW – Room 6A324
Washington, DC 20554

Marc D. Poston
William K. Haas
Dan Joyce
Missouri Public Service Commission
Room 530, 301 West High Street
Jefferson City, MO 65101

ATTACHMENT A

Donald L. Dear
Mayor
City of Gardena
1700 West 162nd Street
Gardena, CA 90347-3778

Attorney for Small Business Alliance for Fair
Utility Regulation
Carl K. Oshiro
Counselor at Law
100 First Street, Suite 2540
San Francisco, CA 94105

Richard A. Muscat
The Gonzalez Law Firm, P.C.
One Westlake Plaza
1705 South Capital of Texas Highway
Suite 100
Austin, TX 78746

Richard A. Askoff
Regina McNeil
NECA
100 South Jefferson Road
Whippany, NJ 07981

Donald W. Downes, Chairman
Glen Arthur, Vice Chairman
Jack R. Goldberg, Commissioner
John W. Betkoski, III, Commissioner
Linda Kelly Arnold, Commissioner
Connecticut Dept. of Public Utility Control
Ten Franklin Square
New Britain, CT 06051

Jane Gail Besser, Chair
Karlen Reed
Massachusetts Dept. of Telecom. & Energy
100 Cambridge Street, 12th Floor
Boston, MA 02202

Richard A. Bilas, President
Mary Adu
Peter Arth, Jr.
Lionel B. Wilson
Helen Mickiewicz
California Public Utilities Commission
State of California
California State Building
505 Van Ness Avenue
San Francisco, CA 94102-3298

L. Marie Guillory
Jill Canfield
R. Scott Reiter
NTCA
2626 Pennsylvania Avenue, NW
Washington, DC 20037

L. Marie Guillory
Jill Canfield
NTCA
4121 Wilson Blvd., 10th Floor
Arlington, VA 22203

David Cohen
Lawrence E. Sarjeant
Keith Townsend
Linda Kent
John W. Hunter
Julie L. Rones
USTA
1401 H Street, NW, Suite 600
Washington, DC 20005

Attorney for NRTA
Margot Smiley Humphrey
Koteen & Naftalin, LLP
1150 Connecticut Ave., NW, Suite 1000
Washington, DC 20036

Andre J. Lachance
GTE Service Corporation
1850 M Street, N.W.
Washington, DC 20036

John F. Raposa
GTE Service Corporation
600 Hidden Ridge, HQE03J27
P.O. Box 152092
Irving, TX 75015-2092

Judy Boley
Federal Communications Commission
445 12th Street, SW – Room 1-C804
Washington, DC 20554

Timothy Fain
OMB Desk Officer
10236 NEOB
725 17th Street, NW
Washington, DC 20503

ATTACHMENT A

Michael E. Glover
John M. Goodman
Attorney for Bell Atlantic
Bell Atlantic
1300 I Street, NW
Suite 400 West
Washington, DC 20005

Alberto Levy, Ph.D
Melissa Caro
Suzi Ray McClellan
Texas Office of Public Utility Counsel
1701 N. Congress Avenue, Suite 9-180
Austin, TX 78701

David Ellen
Senior Counsel
Cablevision Lightpath, Inc.
1111 Stewart Avenue
Bethpage, NY 11714-3581

Cherie R. Kiser
Gil M. Strobel
Carlos A. Gutierrez
Mintz, Levin, Cohn, Ferris, Glovsky and
O'Peo, P.C.
701 Pennsylvania Avenue, NW
Suite 900
Washington, DC 20004

Jane Kunka
Manager, Public Policy
Qwest Communications Corp.
4250 North Fairfax Drive
Arlington, VA 22203

Teresa K. Gaugler
Federal Regulatory Attorney
Qwest Communications Corp.
4250 North Fairfax Drive
Arlington, VA 22203

Peggy Arvanitas
%RE/MAX First Class
621 Bypass Drive
Clearwater, FL 33764

Pamela J. Riley
David A. Gross
AirTouch Communications, Inc.
1818 N Street, NW – Suite 800
Washington, DC 20036

Blaise Scinto
Federal Communications Commission
Common Carrier Bureau
445 12th Street, SW – 6A420
Washington, DC 20554

David Furth
Federal Communications Commission
Wireless Telecommunications Bureau
445 12th Street, SW – 4B522
Washington, DC 20554

Thomas J. Sugrue, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW – Room 3-C252
Washington, DC 20554

Jim Schlichting, Deputy Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW – Room 3-C254
Washington, DC 20554

Lawrence Strickling, Chief
Federal Communications Commission
Common Carrier Bureau
445 12th Street, SW – Room 4C345
Washington, DC 20554

Attorneys for Time Warner Telecom
Brian Conboy
Thomas Jones
David Don
Attorneys for Time Warner Telecom
Willkie Farr & Gallagher
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20036

William P. Hunt, III
Regulatory Counsel
Level 3 Communications, Inc.
1450 Infinite Drive
Louisville, CO 80027

ATTACHMENT A

Counsel for Level 3 Communications, Inc
Richard M. Rindler
Ronald W. Del Sesto, Jr.
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, DC 20007

M. Robert Sutherland
Theodore R. Kingsley
BellSouth Corporation
Suite 1700, 1155 Peachtree Street, NE
Atlanta, GA 30309-3610

William L. Roughton, Jr.
Associate General Counsel
PrimeCo Personal Communications, L.P.
601 13th Street, NW
Suite 320 South
Washington, DC 20005

Kathryn M. Krause
Attorney for US West Communications, Inc.
Suite 700
1020 19th Street, NW
Washington, DC 20036

Jonathan Chambers
Sprint PCS
1801 K Street, NW, Suite M112
Washington, DC 20006

Jay Keithley
Sprint Corporation
1850 M Street, NW, Suite 1100
Washington, DC 20036

Joseph Assenzo
Sprint PCS
4900 Main, 12th Floor
Kansas City, MO 64112

Mary McDermott
Robert L. Hoggarth
Harold Salters
Personal Communications Industry Assoc.
500 Montgomery Street, Suite 700
Alexandria, VA 22314-1561

Donald K. Stockdale
Associate Bureau Chief
FCC/Common Carrier Bureau
445 12th Street, SW
Washington, DC 20554

Diane Harmon
Assistant Chief – Network Services Division
FCC/Common Carrier Bureau
445 12th Street, SW
Washington, DC 20554

Janice Myles
FCC/Common Carrier Bureau
445 12th Street, SW
Washington, DC 20554

Jodi J. Bair
Robert A. Abrams
Betty D. Montgomery
Duane W. Luckey
Public Utilities Commission of Ohio
Public Utilities Section
180 E. Broad St., 7th Floor
Columbus, OH 43215

Emily M. Williams
ALTS
888 17th Street, NW, Suite 900
Washington, DC 20006

Elizabeth G. Kistner
3 Spoede Ridge
St. Louis, MO 63141

Michael F. Altschul
Randall S. Coleman
Lolita D. Smith
Cellular Telecom. Industry Assoc.
1250 Connecticut Avenue, NW, Suite 800
Washington, DC 20036

Robert S. Foosaner
Lawrence R. Krevor
Laura L. Holloway
Nextel Communications, Inc.
2001 Edmund Halley Drive
Reston, VA 20191

ATTACHMENT A

Leonard J. Kennedy
Laura H. Phillips
David L. Martin
Down, Lohnes & Albertson, P.L.L.C.
1200 New Hampshire Avenue, NW
Suite 800
Washington, DC 20036

Susan M. Eid
Tina S. Pyle
Richard A. Karre
MediaOne Group, Inc
1919 Pennsylvania Avenue, NW
Suite 610
Washington, DC 20006

Kevin Martin, Legal Advisor
Office of Commissioner Furchtgott-Roth
Federal Communications Commission
The Portals
445 12th Street, SW – Rm. 8-A302E
Washington, DC 20554

Linda Kinney, Legal Advisor
Office of Commissioner Ness
Federal Communications Commission
The Portals
445 12th Street, SW – Rm. 8-B114D
Washington, DC 20554

Sarah Whitesell, Legal Advisor
Office of Commissioner Tristani
Federal Communications Commission
The Portals
445 12th Street, SW – Rm. 8-C302B
Washington, DC 20554

Tom Power, Sr. Legal Advisor
Office of Chairman Kennard
Federal Communications Commission
The Portals
445 12th Street, SW – Rm. 8-B201L
Washington, DC 20554

Kyle Dixon, Legal Advisor
Office of Commissioner Powell
Federal Communications Commission
The Portals
445 12th Street, SW – Rm. 8-A204C
Washington, DC 20554

Dorothy Attwood, Legal Advisor
Office of Chairman Kennard
Federal Communications Commission
The Portals
445 12th Street, SW – Rm. 8-B201L
Washington, DC 20554

Robert C. Atkinson, Deputy Chief
Common Carrier Bureau
Federal Communications Commission
The Portals
445 12th Street, SW – Rm. 5-C356
Washington, DC 20554

Paul Misener, Chief of Staff, Sr. Legal
Advisor
Office of Commissioner Furchtgott-Roth
Federal Communications Commission
The Portals
445 12th Street, SW – Rm. 8-A302B
Washington, DC 20554

William Bailey
Office of Commissioner Furchtgott-Roth
Federal Communications Commission
The Portals
445 12th Street, SW – 8th Floor
Washington, DC 20554

Rick Chessen
Office of Commissioner Tristani
Federal Communications Commission
445 12th Street, SW – 8th Floor
Washington, DC 20554

Richard Eyre
PO Box 2408
Tempe, AZ 85280-2408

Alan C. Hasselwander
Chairman
North American Numbering Council
4140 Clover Street
Honeoye Falls, NY 14472

Reginald N. Todd
Chief Legislative Representative
County of Los Angeles
Washington, DC Legislative Office
440 1st Street, NW, Suite 440
Washington, DC 20001

ATTACHMENT A

Michael D. Antovich
Supervisor, 5th District
Board of Supervisors
County of Los Angeles
Room 869 Kenneth Hahn Hall of Adm.
500 West Temple Street
Los Angeles, CA 90012

Attorneys for Paging Network, Inc
Judith St. Ledger-Roty
Todd D. Daubert
Kelley, Drye & Warren, LLP
1200 19th Street, NW, Suite 500
Washington, DC 20036

Gilbert J. Yablon
SMART Dialing Systems
21914 Dumetz Road
Woodland Hills, CA 91364

Peter Arth, Jr.
Lionel B. Wilson
Helen M. Mickiewicz
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Robert G. Berger
Russell C. Merbeth
Daniel F. Gonos
WinStar Communications, Inc.
1146 19th Street, N.W.
Washington, DC 20036

Howard J. Symons
Sara F. Seidman
Amy Bushyeager
Mintz, Levin, Cohn, Ferris, Glovsky & Popeo
701 Pennsylvania Avenue, NW
Suite 900
Washington, DC 20004

Mark C. Rosenblum
Roy E. Hoffinger
James H. Bolin, Jr
Room 3245H1 - 295 North Maple Avenue
Basking Ridge, NJ 07920

Douglas I. Brandon
Vice President – External Affairs
AT&T
1150 Connecticut Ave., NW, Suite 400
Washington, DC 20036

Dan Connors, Legal Advisor
Office of Commissioner Ness
Federal Communications Commission
The Portals
445 12th Street, SW – Room 8B114D
Washington, DC 20554

Ari Fitzgerald, Legal Advisor
Office of Chairman Kennard
Federal Communications Commission
The Portals
445 12th Street, SW – Room 8B201
Washington, DC 20554

John Spencer
Wireless Telecommunications Bureau
Federal Communications Commission
The Portals
445 12th Street, SW – Room 3A103
Washington, DC 20554

Patrick Forster
Network Services Division
Common Carrier Bureau
Federal Communications Commission
The Portals
445 12th Street, SW – Room 6A461
Washington, DC 20554

Mary A. Keeney
Assistant Attorney General
Office of the Attorney General
Natural Resource Division
P.O. Box 12548, Capitol Station
Austin, TX 78711-2548

Lawrence G. Malone
General Counsel
Public Service Commission of the State of
New York
Three Empire State Plaza
Albany, NY 12223-1350

ATTACHMENT A

Joe Garcia, Chairman
Florida Public Service Commission
Capital Circle Office Center
2540 Shunard Oak Blvd.
Tallahassee, FL 32399-0850

Trina M. Bragdon
Staff Attorney
State of Maine Public Utilities Commission
242 State Street
18 State House Station
Augusta, ME 04333-0018

Karen J. Reed
Dept. of Telecommunications & Energy
100 Cambridge Street, 12th Floor
Boston, MA 02202

Cynthia B. Miller, Sr. Attorney
Rob Vandiver, General Counsel
State of Florida Public Service Commission
2540 Shunard Oak Blvd.
Tallahassee, FL 32399-0850

James Lanni
Rhode Island Division of Public Utilities
100 Orange Street
Providence, Rhode Island 02903

Charles F. Larken
Vermont Dept. of Public Service
120 State Street
Montpelier, VT 05602

Keikki Leesment
New Jersey Board of Public Utilities
2 Gateway Center
Newark, NJ 07102

Marlene L. Johnson
Chairperson
DC Public Svc. Commission
717 14th Street, NW
Washington, DC 20005

Joel B. Shifman
Maine Public Utility Commission
State House Station 18
Augusta, ME 04865

Rita Barmen
Vermont Public Service Board
89 Main Street
Montpelier, VT 05602

Veronica A. Smith
David E. Screven
Pennsylvania Public Utility Comm.
P.O. Box 3265
Harrisburg, PA 17105-3265

Telecommunications Report
1333 H Street, NW – 11th Floor
West Tower
Washington, DC 20005

Alabama Public Svc. Commission
PO Box 304260
Montgomery, AL 36130-4260

Sandy Ibaugh
Indiana Utility Regulatory Commission
901 State Office Bldg.
Indianapolis, IN 46204

Mary Street
Iowa Utilities Board
Lucas Bldg., 5th Floor
Des Moines, Iowa 50316

Gordon L. Persinger
Missouri Public Svc. Commission
P.O. Box 360
Jefferson City, MO 65102

Camille Stonehill
State Telephone Regulation Rpt.
1101 King Street, Suite 444
Alexandria, VA 22314

Richard Collier
Chief Counsel
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Gary Evenson
Wisconsin Public Service Commission
PO Box 7854
Madison, WI 53707

ATTACHMENT A

Ronald Choura
Michigan Public Service Commission
6545 Mercantile Way
Lansing, MI 48910

Sam Loudenslager
Arkansas Public Service Commission
PO Box C-400
Little Rock, AK 72203

Maribeth D. Swapp
Deputy General Counsel
Oklahoma Corp. Commission
400 Jim Thorpe Building
Oklahoma City, Oklahoma 73105

Edward Morrison
Oregon Public Utilities Commission
Labor and Industries Building
Room 330
Salem, OR 97310

Glenn Blackmon
Washington Utilities and Transportation
Commission
PO Box 47250
Olympia, WA 98504-7250

Ann Seha, Assistant Attorney General
Manager, Public Utilities Division
121 7th Place East, Suite 350
St. Paul, MN 55101

Deonne Brunning
Nebraska Public Svc. Commission
1200 N Street
Lincoln, NE 68508

Marsha H. Smith
Idaho Public Utilities Commission
Statehouse
Boise, Idaho 83720

Myra Karegianes
General Counsel
Illinois Commerce Commission
State of Illinois Building
160 North LaSalle – Suite C-800
Chicago, IL 60601-3104

Robin McHugh
Montana Public Service Commission
PO Box 202601
Helena, MT 59620-2601

Diane Munns
Iowa Utilities Board
350 Maple Street
Des Moines, Iowa 50319

Jane Gail Besser, Chair
James Connelly, Commissioner
W. Robert Keating, Commissioner
Paul. B. Vasington, Commissioner
Eugene J. Sullivan, Jr. Commissioner
Massachusetts Dept. of Telecom. & Energy
One South Station, 2nd Floor
Boston, MA 02110

Glen F. Ivey, Chairman
Maryland Public Service Commission
6 St. Paul Street , 16th Floor
Baltimore, MD 21202-6806

Bill Allen
Bell Atlantic Telephone Corp.
158 State Street
Albany, NY 12207

John Goodman
Mary Liz Hepburn
Marie Breslin
Bell Atlantic
1300 I Street, NW
Suite 400W
Washington, DC 20005

Ronald J. Binz, Co-Chair
No. American Numbering Council
Competition Policy Institute
3773 Cherry Creek, North Drive
Suite 1050
Denver, CO 80209

Prof Bill Neill, In Pro Per
PO Box 33666
San Diego, CA 92163-3666

ATTACHMENT A

Diana Caldwell, Esq.
Division of Appeals, Room 310
Florida Public Svc. Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Jack Shreve
Public Counsel
Office of Public Counsel
111 West Madison St, Room 812
Tallahassee, FL 32399-1400

Angela Green, Esq
Florida Public Telecom. Association
125 S. Gadsden St., Suite 200
Tallahassee, FL 32301

Marsha Rule, Esq.
Tracy Hatch, Esq.
101 N. Monroe Street, Suite 700
Tallahassee, FL 32301

Peter M. Dunbar, Esq.
Pennington, Moore, Wilkinson, Bell &
Dunbar, P.A.
PO Box 10095
Tallahassee, FL 32302-2095

Carolyn Marek
Vice President of Regulatory Affairs
Southeast Region
Time Warner Communications
233 Bramerton Court
Franklin, TN 37069

Francis J. Heaton
2100 Electronics Lane
Fort Myers, FL 33912

Kenneth Hoffman
John Ellis
Rutledge, Ecenia, Purnell & Hoffman, P.A.
PO Box 551
Tallahassee, FL 32302

Bruce May
Holland & Knight
315 S. Calhoun Street, Suite 600
Tallahassee, FL 32301

Nancy B. White, Esq.
C/o Nancy H. Sims
BellSouth Telecommunications, Inc.
150 So. Monroe Street, Suite 400
Tallahassee, FL 32301

Michael Gross
Florida Cable Telecom. Association, Inc.
310 N. Monroe Street
Tallahassee, FL 32301

Kimberly Caswell
GTE Florida Incorporated
PO Box 110, FLTC0007
Tampa, FL 33601

Patrick Wiggins, Esq.
Charles Pellegrini, Esq.
PO Drawer 1657
Tallahassee, FL 32303

Laura Gallagher
204 S. Monroe St., Suite 201
Tallahassee, FL 32301

Monica M. Barone
Sprint Communications Company Ltd.
3100 Cumberland Circle
Mailstop GAATLN0802
Atlanta, GA 30339

David V. Dimlich, Esq.
Supra Telecom. & Information Systems
2620 SW 27th Avenue
Miami, FL 33133

Charles Rehwinkle
Sprint-Florida Inc.
PO Box 2214
Tallahassee, FL 32316-2214

Gregory J. Doyle
Minnesota Dept. of Public Service
121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

ATTACHMENT A

Alfred G. Richter, Jr.
Roger K. Toppins
John S. Di Bene
SBC Communications, Inc.
One Bell Plaza, Room 3022
Dallas, TX 75202

New Hampshire Ofc of Consumer Advocate
F. Anne Ross
William P. Homeyer
117 Manchester Street
Concord, NH 03301

Richard Arsinow
1925 N. Neva Avenue
Elmwood Pk., IL 60707

Curtis L. Groves, Esq.
Hope H. Barbulescu, Esq.
MCI WorldCom
5 International Drive
Rye Brook, NY 10573-1095

Mary DeLuca
MCI WorldCom
1801 Pennsylvania Avenue, NW
Washington, DC 20006

Virginia State Corporation Commission
Tyler Building
PO Box 1197
Richmond, VA 23218

Saco River Telegraph and Telephone Co.
PO Box 48
Bar Mills, ME 04004

Theresa Fenelon Falk
Attorney for Saco River Telegraph and
Telephone Co.
Pillsbury Madison & Sutro
1100 New York Avenue, NW
9th Floor, East Tower
Washington, DC 20005

Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Cynthia B. Miller
Florida Public Svc. Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Ben Almond
BellSouth
Suite 900
1133 21st Street, NW
Washington, DC 20036

Cheryl Tritt
Counsel for NeuStar, Inc.
Morrison & Foerster
2000 Pennsylvania Avenue, NW
Washington, DC 20006

Carol Ann Bischoff
Robert M. McDowell
Competitive Telecommunications
Association
1900 M Street, NW
Suite 800
Washington, DC 20036

Robert Aamoth
Todd D. Daubert
Kelley Drye & Warren
1200 19th St., NW
Suite 500
Washington, DC 20036

Delia Reid Saba
Christopher J. Wilson
Attorneys for Cincinnati Bell Telephone
Company
201 E. 4th Street
Room 102-620
Cincinnati, OH 45202

Michael F. Altschul
Randall S. Coleman
Lolita D. Smith
Cellular Telecommunications Industry
Association
1250 Connecticut Ave., NW
Suite 800
Washington, DC 20036

ATTACHMENT A

Mary McDermott
Robert L. Hoggarth
Harold Salters
Personal Communications Industry
Association
500 Montgomery Street
Suite 700
Alexandria, VA 22314-1561

Davis Wright Tremaine LLP
Daniel M. Waggoner
Robert S. Tanner
Jane Whang
1155 Connecticut Ave., NW
Suite 700
Washington, DC 20036

NEXTLINK Communications
R. Gerard Salemme
Daniel Gonzalez
Jason Williams
1730 Rhode Island Ave., NW
Suite 1000
Washington, DC 20036

Laurence E. Harris
David S. Turetsky
Terri B. Natoli
Victoria A. Schlesinger
Teligent, Inc.
8065 Leesburg Pike
Vienna, VA 22182

Douglas L. Povich
Robert E. Stup, Jr.
Squire, Sanders & Dempsey
1201 Pennsylvania Ave., NW
Washington, DC 20004

Lee L. Selwyn
Helen Golding
Scott C. Lundquist
Economics and Technology, Inc.
One Washington Mall
Boston, MA 02108

Colleen Boothby
Levine, Blaszak, Block and Boothby
Counsel for The Ad Hoc
Telecommunications Users Cmte.
2001 L Street, NW
Suite 900
Washington, DC 20036

Pamela J. Riley
David A. Gross
Airtouch Communications, Inc.
1818 N Street, NW
Suite 800
Washington, DC 20036

James U. Troup
Robert H. Jackson
Arter & Hadden
Attorneys for Iowa Telecommunications
Services, Inc.
1801 K Street, NW
Suite 400K
Washington, DC 20006

City of Raytown, Missouri
Sue Frank, Mayor
10000 East 59th Street
Raytown, MO 64133

City of Warren
R. Gregg Reep, Mayor
P.O. Box 352
Warren, AK 71671

City of Tulsa
M. Susan Savage, Mayor
200 Civic Center
Tulsa, OK 74103

Debra E. Perkins
815 Ashland Avenue, Apt. 210
Santa Monica, CA 90405

ATTACHMENT A

Eldridge Stafford
U S West
Suite 700
1020 19th Street, NW
Washington, DC 20036

Rebecca Beynon
Office of Cmmr. Furchtgott-Roth
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

Shirley Berg
13532 Mineola St.
Arleta, CA 91331

Joe Hanna
John Ramsey
Assoc. of Public Safety Comm. Officials
Intl.
2040 S. Ridgewood Dr.
South Daytona, FL 32119

Bill Hinkle
Mark Adams
National Emergency Number
Association
491 Chesire Rd.
Sunbury, OH 43074

Robert W. McCausland
Allegiance Telecom, Inc.
1900 Stemmons Freeway
Suite 3026
Dallas, TX 75207

Mary C. Albert
Allegiance Telecom, Inc.
1100 15th St., NW, Suite 200
Washington, DC 20005

Ruth Milkman
Michael B. Hazzard
Lawler, Metzger & Milkman
Counsel for Allegiance Telecom, Inc.
1909 K Street, NW, Suite 820
Washington, DC 20006

Kathryn Krause
U S West, Inc.
1801 California Street
Suite 5100
Denver, CO 80202

Lynda L. Dorr
Secretary to the Commission
Public Service Commission of
Wisconsin
610 North Whitney Way
PO Box 7854
Madison, WI 53707-7854

Dee Hardison
Mayor
City of Torrance
3031 Torrance Blvd.
Torrance, CA 90509-2970